



SHERWIN-WILLIAMS.

THE SHERWIN-WILLIAMS COMPANY
Environmental, Health & Regulatory Services
101 Prospect Avenue NW
Cleveland, Ohio 44115-1075
Facsimile: (216) 566-2730

December 1, 2010

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Response to EPA Comments dated October 26, 2010 on
Kirkwood Lake Investigation Report – Response to USEPA Comments
and Work Plan Request

Sherwin-Williams/Hilliards Creek Site – Kirkwood Lake
Voorhees Township and Lindenwold Borough, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035

Dear Mr. Klimcsak:

The Sherwin-Williams Company (Sherwin-Williams) has received and reviewed the EPA comments dated October 26, 2010 on the June 11, 2010 “*Response to EPA Comments: Kirkwood Lake Investigation Report - Evaluation of Sampling Results* (dated April 30, 2009), and *Supplemental Remedial Investigation Work Plan, Kirkwood Lake Sediment and Soil Sampling, and Residential Property Soil Sampling*” (Work Plan). This letter acknowledges and accepts the EPA comments on the Kirkwood Lake soil and sediment sampling component of the June 2010 Work Plan. Additional discussions between EPA and Sherwin-Williams on the properties that will be included in the residential sampling component are ongoing, and the scope for the residential sampling will be finalized as part of these discussions.

Sherwin-Williams is providing a comment-by-comment response to the EPA October 26, 2010 letter. The EPA comments are presented in *italics*, followed by the Sherwin-Williams response.

General Comments

1. *EPA and NJDEP disagree with the statement made on Page 3, which states: “At depth, the coarse-grained material beneath Kirkwood Lake is soil, not sediment, since there is no potential for benthic exposure.” While a specific depth is not provided here, one is later provided on Page 18 of the Work Plan, where it is proposed that (sediment) samples collected from a depth greater than six feet will be compared to the NJDEP Residential Direct Contact Soil Remediation Standard (RDCSRS). At the time of field sampling the physical characteristics (grain size, percent solids, and organic carbon content) will not be known. As noted by Sherwin-Williams in the submittal, even after sampling and data is*

compiled, “professional judgment”, “review of photographs”, and “field observations” had to be employed to determine the characteristics of the sediment. All of this is further complicated by the fact that an additional zone (the transition zone) has been proposed to the two existing sediment classification types (i.e., soft, organic-rich sediment [silt] and coarse-grained “material” [consolidated coarser-grained sand].)

However, for purposes of driving this sampling program forward, comparing the XRF screening results (for sediment deeper than 6.0 ft) to the NJDEP RDCSRS is permitted. If additional data is required at a later time to perform a Risk Assessment, it should be noted that additional samples may be required.

Response: Sherwin-Williams acknowledges and understands the EPA and NJDEP comment. A more definitive basis to classify the deeper samples will be provided by physical data that will be collected as part of the sampling program. It is also acknowledged that additional samples may be required in the future for Risk Assessment purposes.

2. *EPA is not requesting that an evaluation of results and proposal to complete soil and sediment delineation (report – similar to those for the Route 561 Dump, Vacant Lot, and United States Avenue Burn sites) for the Hilliard’s Creek portion of the Sherwin-Williams/Hilliard’s Creek Site be created and submitted to EPA at this time. Instead, after the submittal of the reports for the Railroad area and Bridgewood Lake are submitted, EPA is requesting that a proposal for any additional sampling (required) at the Former Manufacturing Plant (FMP) area be submitted. The proposal should also present a summary of the data collected from the 2009 Supplemental Work Plan. EPA is requesting that this FMP data summary and sampling proposal be submitted to EPA in 60 days.*

Response: Sherwin-Williams will prepare the requested data analysis and proposal for additional sampling (if any) at the FMP area. However, the data evaluation is ongoing and expected to require a period greater than the 60 days specified by EPA. Sherwin-Williams is requesting a 60-day extension, so that the data evaluation and proposal for additional sampling would be submitted on March 1, 2011.

Specific Comments

1. *It is permissible to reduce the analyte list, along with the request to conduct residential sampling of the homes along Kirkwood Lake, to TAL Metals and cyanide only.*

Response: The EPA comment is acknowledged.

2. *The current residential soil sampling proposal includes the fact that the 2.0 – 2.5 ft. intervals will be screened with the XRF. It should be noted that all other residential sampling (Hilliards Creek and elsewhere) established that in addition to the 0.0 – 0.5 ft. interval (which has been proposed for the Kirkwood Lake homes), the 1.5 – 2.0 ft. interval was to be sampled and this depth should be*

employed here as well. In addition, it is not necessary to perform XRF screening on the deeper samples.

Response: When the Kirkwood Lake residential soil sampling is conducted, the sampling intervals will be 0.0 – 0.5 ft. and 1.5 – 2.0 ft. Sherwin-Williams will consider whether additional screening of the deeper samples will be performed.

3. *EPA and NJDEP maintain the prior request to install a monitoring well across the first water table at a location between White Horse Road and samples KWSB0014 and KWSB0015.*

Response: On November 18, 2010, a site walk was conducted with EPA (Raymond Klimcsak), NJDEP (Joseph Marchesani), HDR, the EPA oversight contractor (Andrew Wadden), Sherwin-Williams (Mary Lou Capichioni) and Weston (Arthur Fischer) to discuss the installation of this proposed well. Based on the site walk, the well installation will be deferred pending additional guidance from the NJDEP.

4. *On page 18, it is stated that sediment samples will be analyzed for TAL Metals (plus cyanide), percent solids, and total organic carbon. However, as previously requested in EPA's March 11, 2010 comment letter, EPA maintains that grain size and pH also be analyzed and reported. Incidentally, these were also the same parameters which were collected during the October/November 2007 sampling effort.*

Response: The sediment samples will also be analyzed for grain size and pH, and these results will be reported.

The October 26, 2010 letter requests that a draft Work Plan for the activities outlined in Attachment 1 be submitted. As discussed with EPA, the June 11, 2010 Supplemental Remedial Investigation Work Plan, with the clarifications provided in this letter, will suffice to meet this request and no additional response is required.

Should you have any other recommendations or if you have any questions or comments, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,



Mary Lou Capichioni
Director Remediation Services

cc: J. Josephson, USEPA
M. Pensak, USEPA
W. Sy, USEPA
P. Parvin, HDR
L. Vogel, NJDEP (4 copies)
C. Fishman, Camden County Parks Department
J. Gerulis, Sherwin-Williams (w/o enclosures)
A. Danzig, Sherwin-Williams (w/o enclosures)
S. Peticolas, Gibbons (w/o enclosures)
H. Martin, ELM
R. Mattuck, Gradient
S. Jones, Weston
S. Clough, Weston
A. Fischer, Weston